

#### **IDAHO CAREER INFORMATION SYSTEM**

#### PRODUCT PRIVACY POLICY

The Career Information System Internet System software provided at this website will be referred to as "CIS Products." This version of CIS Products is created and maintained by intoCareers, an outreach center within the College of Education at the University of Oregon, and operated by Idaho Career Information System (hereinafter "Idaho CIS"). The purpose of any Career Information System Product is to help you identify career and education opportunities and make career plans.

Access to CIS Products is available through the school or the organization providing you with career development services. You may access all of the content in the CIS Products without entering any personal information. However, to take advantage of some components of this website, you must create a personal portfolio called My CIS Portfolio. To create a portfolio you will enter your first and last name, your email address, a user name, a password and responses to security questions. After you create a portfolio, you have complete control over the information you choose to save in your My CIS Portfolio. In order to make the most use of the portfolio, you will need to enter or save personal information such as your preferences and notes on why you are interested in particular careers or educational opportunities.

The first time you use CIS Products after creating your personal portfolio, you will be asked whether you want faculty or staff in the school or organization that provided CIS Products to be able to access your My CIS Portfolio contents. If you respond 'Yes,' then you are forgoing your right to privacy with respect to the contents of your portfolio. If you respond 'No,' then the contents of your portfolio will remain private, subject to the terms of the privacy policy described below. Idaho CIS recognizes and respects your right to privacy.

#### **Protection from Data Breach**

intoCareers and Idaho CIS have in place Administrative Security, Physical Security and Logical Security controls to protect from a data breach or unauthorized disclosure. Access to non-aggregate student information is restricted to a few key personnel and limited to the technical management of the records or specific support related activities. Servers and backups are located in secured facilities and the databases containing student information are encrypted. User accounts are role-based and password protected. This provides tiered levels of permissions so that access to data can be restricted to the requirements of that user.

intoCareers and Idaho CIS comply with all applicable state and federal laws, including the Family Educational Rights and Privacy Act of 1974, as amended (FERPA), the Children's On-Line Privacy Protection Act of 1998 and the Idaho Student Data Accessibility, Transparency, and Accountability Act of 2014 (Idaho Data Accountability Act). Except as stated herein, or as otherwise provided or permitted by law, this information is not disclosed to any other group or agency for any purpose, nor, except as necessary to correct system problems, is individual information looked at by staff of intoCareers or Idaho CIS. intoCareers and Idaho CIS will not use any information collected for sales, marketing or advertising.





## **General Website Activity**

In general, Idaho CIS maintains logs of website usage in order to improve the website. This information is collected in aggregate and is not identifiable to an individual user. We gather such information as how often content is accessed, frequency of responses for assessment questions, average length of user session, etc. This information is reported in aggregate and may be shared with others but cannot be used to identify individuals or the data they save in their portfolio.

# **Institution-level Reports**

Schools or agencies that make CIS Products available to their students or clients can receive aggregated information in the form of various reports. This information cannot be used to identify individual users. These reports are designed to help CIS Coordinators (i.e., individuals at the institution responsible for providing access to CIS Products) evaluate use of CIS Products by their students or clients and enhance their career development programs and services.

#### Portfolios for Students at K-12 Institutions

K-12 institutions are covered by the Family Educational Rights and Privacy Act of 1974 as amended (FERPA). Additionally, CIS is designed in accordance with the Children's On-Line Privacy Protection Act of 1998.

FERPA includes provisions that reflect the way CIS operates in K-12 institutions. FERPA requires written parental consent be obtained before K-12 institutions can release education records, unless school officials within the educational institution or local educational agency have legitimate educational interest to review such records. First, portions of all student portfolios at a school may be accessible to the CIS Coordinator for the institution and to designees of the CIS Coordinator. However, under FERPA, the Coordinator and/or the designees must have a "legitimate educational interest" to look at material in a student's portfolio. CIS Coordinators and their designees can only view personal reflections, or notes, if the student is Opted-In and if CIS Coordinator or their designees have a legitimate educational interest. CIS Coordinator and their designees shall not view any part of student portfolios if they do not have a legitimate educational interest in reviewing such materials. The CIS Coordinator may set a policy in which all students are Opted-In or leave the choice to the student. If the policy is set so that all students are Opted-In, the student will receive notification of this policy the first time they log in.

Provisions of the Children's On-Line Privacy Protection Act of 1998 require verifiable parental consent in order to collect personal information on individuals under the age of 13 ("Child"). Schools making CIS available to students under the age of 13 shall obtain written authorization from parents or legal guardians before a Child creates an on-line portfolio. The parent must agree to the provisions of the CIS Privacy Policy. Parents may obtain access to their Child's portfolio from the school's CIS Coordinator or by using the Child's user name and password. CIS Coordinators can delete the Child's portfolio if the parent wishes to prohibit future use of the portfolio. CIS Coordinators may also request that the option to create a personal portfolio be disabled for all students at a school.

# **Use of Cookies**

CIS Products use cookies, small bits of electronic information stored on your computer during the time you are accessing CIS Products. The cookie does not contain personal information. The cookie is erased





whenever you "log out" of CIS Products, close your browser or if you remain connected but inactive for 24 hours.

#### **Linked Websites**

intoCareers and Idaho CIS have identified many other third party websites that may help you in exploring career and education options. These third party websites are provided solely as a convenience to you. If you use these links, you will leave this Website. intoCareers and Idaho CIS have not reviewed all of these third party websites and do not control and are not responsible for any of these websites or their content. intoCareers and Idaho CIS does not endorse or make any representations about them, or any information, software or other products or material found there, or any results that may be obtained from using them. If you decide to access any of the third party websites linked to this website, you do this entirely at your own risk.

#### **HOW TO REMOVE YOUR INFORMATION**

My CIS Portfolio promotes lifelong career planning through continuous access to your portfolio. If at any time you would like to remove your information, please contact the CIS Coordinator at your school or agency. After five years of non-use, your portfolio will automatically be disabled.

Users may also request a copy of all information Idaho CIS has collected about them by signing and mailing a letter of request to the address listed below. For this request, please include your first and last name, your user name and the school or agency your portfolio is associated with.

## Penalties for non-compliance

Any violation of these provisions for non-compliance may be subject to a civil penalty not to exceed Fifty Thousand dollars (\$50,000) per violation as provided in I.C. §33-133.

If you have any further questions about CIS products or privacy policy, please contact:

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Fax: 208.334.6430

Email: idahocis@labor.idaho.gov

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